

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL
FILE

In the Matter of)

)
Amendment of Parts 2, 21, 25 and 94)
of the Commission's Rules to)
Accommodate Common Carrier and Private)
Operational Fixed Microwave Systems)
in Bands Above 3 GHz)

RM-8004

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS OF PAN AMERICAN SATELLITE

Pan American Satellite ("PAS"), by its attorneys, hereby submits these reply comments in the above-captioned proceeding. PAS operates the PAS-1 satellite, a hybrid C/Ku-band satellite that provides voice, video, and data services between and among countries in North and South America, the Caribbean, and Europe. PAS has conditional authorizations and pending applications to construct, launch, and operate additional satellites in the Atlanta, Pacific, and Indian Ocean Regions.

This proceeding concerns the petition for rulemaking that was filed by Alcatel Network Systems, Inc. ("Alcatel"). Alcatel has proposed, among other things, that the Commission downgrade from co-primary to secondary status the use by satellite service licensees of two frequency blocks in the 4 GHz band; each frequency block would have a bandwidth of 40 MHz. Alcatel proposes that this 80 MHz be made available to accommodate private and common carrier microwave licensees that might be displaced if the Commission were to reallocate the 1.85-2.2 GHz band for use by providers of emerging telecommunications technologies.

Hughes Communications Galaxy, Inc. ("HCG") and Home Box Office ("HBO") have filed initial comments opposing this Alcatel proposal, and PAS concurs with HCG and HBO. Depriving the

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satellite service of primary access to 80 MHz -- a full 16% of the service's present C-band allocation for space-to earth transmissions -- would simply substitute one displaced group of licensees for another. This deprivation is unnecessary, moreover, because there are adequate alternative means for accommodating microwave users.

The Alcatel proposal, in addition to having the adverse impact on domestic video transmissions that is described in the HCG and HBO comments, also would detrimentally affect international data communications. PAS must rely heavily on the C-band for transmitting data internationally, because: (1) many international data paths, unlike their domestic counterparts, are not traversed by fiber optic cable, and (2) unlike in the U.S., C-band equipment is more readily available than Ku-band in many parts of the world.

CONCLUSION

For the reasons that are stated herein, Alcatel's proposal to downgrade the use of 80 MHz of C-band spectrum by satellite service licensees should be rejected.

Respectfully submitted,

PAN AMERICAN SATELLITE

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July 17, 1992

CERTIFICATION OF SERVICE

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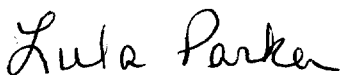
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